

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

No. 08-3023-STB

UNITED STATES OF AMERICA

vs.

RAYMOND HUNTER GEISEL,

Defendant.

_____ /

CRIMINAL COVER SHEET

1. Did this matter originate from a matter pending in the United States Attorney's Office prior to April 1, 1999? Yes No
If yes, was it pending in the Central Region?
 Yes No
2. Did this matter originate from a matter pending in the United States Attorney's Office prior to April 1, 2003? Yes No
3. Did this matter originate from a matter pending in the Narcotics Section (Miami) of the United States Attorney's Office prior to May 18, 2003? Yes No
4. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office prior to October 14, 2003? Yes No
5. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to September 1, 2007? Yes No

Respectfully submitted,

R. ALEXANDER ACOSTA
UNITED STATES ATTORNEY

BY:

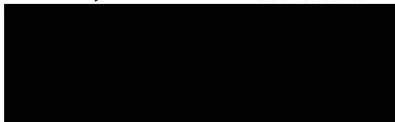
Joseph B. Shumofsky
JOSEPH B. SHUMOFSKY

ASSISTANT UNITED STATES ATTORNEY

Court ID No. A5501022

99 N. E. 4th Street

Miami, Florida 33132-2111



United States District Court

SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

v.

CRIMINAL COMPLAINT

RAYMOND HUNTER GEISEL

CASE NUMBER: 08-3023-STB

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about July 25, 2008, in Miami-Dade County, in the Southern District of Florida, the defendant, RAYMOND HUNTER GEISEL, did knowingly and willfully threaten to kill, kidnap and inflict bodily harm upon a major candidate for the office of President of the United States, that is, Senator Barack Obama, in violation of Title 18, United States Code, Section 879.

I further state that I am a Special Agent with United States Secret Service and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Paul R. Adie

PAUL R. ADIE, SPECIAL AGENT
UNITED STATES SECRET SERVICE

Sworn to before me, and subscribed in my presence,

August 3, 2008
Date

at Miami, Florida
City and State

STEPHEN T. BROWN
UNITED STATES MAGISTRATE JUDGE
Name and Title of Judicial Officer

[Signature]
Signature of Judicial Officer

AFFIDAVIT

I, Paul R. Adie, being duly sworn, state the following:

1. I am a Special Agent with the United States Secret Service and have been so employed since July 2002. Currently, I am assigned to the Miami Field Office – Protective Intelligence Squad. My duties include, but are not limited to, investigating threats against the President of the United States, Vice-President of the United States, former Presidents, and individuals campaigning for the office of President of the United States.

2. This affidavit is made in support of a complaint filed against RAYMOND HUNTER GEISEL based upon information personally known to me and information that I obtained from other law enforcement officers and civilian witnesses. This affidavit is not intended to include all facts learned during the course of the investigation, only those that I believe are necessary to support a finding of probable cause.

3. On July 31, 2008, I received information from Detective Rick Edwards, Homeland Security Unit, Miami-Dade Police Department, regarding a report that GEISEL had made threats against Senator Barack Obama while attending a bail bondsman training class at the ACE Bonding Company, 1575 NW 14th Street, Miami, Florida, which ran from approximately July 21 through August 1, 2008.

4. There were forty-eight students, including GEISEL, who attended the bail bondsman class. GEISEL and other class attendees resided at the Holiday Inn Express, 5125 NW 36th Street, Miami, Florida, while they were attending the class.

5. On August 1, 2008, I went to the ACE Bonding Company and interviewed GEISEL after he finished his final exam. GEISEL consented to the interview.

6. GEISEL denied making threats against Senator Obama or President George W. Bush. GEISEL did state, however, that if he wanted to kill Senator Obama he simply would shoot him with a sniper rifle, but then he claimed that he was just joking. GEISEL signed the following written statement: "I Ray Geisel did not say I was going to kill any President or Senter Obama." (sic).

7. GEISEL stated that he has lived most of his life in the Bangor, Maine area and that he recently moved to Florida in approximately January 2008. A records search revealed that GEISEL resides at [REDACTED], Marathon, Florida 33050. GEISEL claimed that he lives with his girlfriend, [REDACTED], on a sailboat at that address. GEISEL stated that, since moving to Florida, he has driven back and forth to Maine on several occasions.

8. GEISEL claimed to be a victim of physical and emotional abuse when he was younger and said he had voluntarily checked himself into a mental health facility in Maine and also had sought psychiatric treatment for post traumatic stress disorder. GEISEL was unable to provide the name of the mental health facility or the dates or locations for any of the above psychiatric treatment.

9. After receiving written consent from GEISEL, I searched his 1998 Ford Explorer, license plate [REDACTED] (Maine), which was parked in the lot of ACE Bonding Company. During the search, I found, among other things, the following: (i) numerous military fatigue uniforms, (ii) a machete, (iii) numerous hand held radios, (iv) police-type emergency lights (flashing red and yellow lights), which were wired into the Ford Explorer, (v) a safe containing 9mm ammunition and a small knife, (vi) one round of ammunition for a .223 caliber rifle, and (vii) a police-type raid vest.

10. After receiving written consent from GEISEL, I searched room 313 at the Holiday Inn Express where he was residing. During my search, I found, among other things, the following: (i) 40 rounds of 9mm Black Talon (armor piercing) handgun ammunition, (ii) 23 rounds of 9mm Hydrashock handgun ammunition, (iii) 50 rounds of regular 9mm pistol ammunition, (iv) level III body armor, (v) two expandable batons, (vi) a stun gun, (vii) a combat style hatchet, (viii) binoculars, (ix) numerous knives, including survival combat knives and boot knives, (x) two canisters of tear gas, (xi) a Global Positioning Satellite system (GPS), (xii) a loaded 9mm handgun, serial #MPM5637, and (xiii) four magazines loaded with 9mm pistol ammunition.

11. GEISEL generally provided no excuse for why he had the above listed items with him, claiming that he is a collector of such items. He did state that he used the 9mm handgun on the firing range during the bail bondsman course, used the knives for protection and used the machete and hatchet for cutting through the brush in Maine. GEISEL also claimed that possession of all of the items was legal but asked for confirmation whether it was legal to possess the armor piercing rounds. It was later confirmed that it is legal to possess armor piercing rounds in Florida.

12. Continuing on August 1, 2008, I conducted a telephonic interview of R.D.R., another student in GEISEL's bail bondsman class. R.D.R. stated that, during one of the classes, between approximately July 25, 2008 and July 28, 2008, she heard GEISEL speaking about Senator Obama and state: "That nigger, if he gets elected, I'll assassinate him myself."

13. Continuing on August 1, 2008, I also conducted a telephonic interview of J.J., another student in GEISEL's bail bondsman class who also was residing at the

Holiday Inn Express. J.J. stated that, at the Holiday Inn Express one day after class, between approximately July 23, 2008 and July 25, 2008, she heard GEISEL state that he hated George W. Bush and that he wanted to put a bullet in the President's head.

14. On August 2, 2008, I arrested GEISEL at the Holiday Inn Express. Following his arrest, GEISEL signed a written waiver of his *Miranda* rights. GEISEL stated that he may or may not have threatened the life of Senator Obama but could not remember. GEISEL claimed that he suffers from post traumatic stress disorder, which affects his memory.

15. Senator Obama arrived in St. Petersburg, Florida at approximately 1:23 a.m., on August 1, 2008, where he stayed until the afternoon of August 1, when he travelled to the Tampa and Lakeland, Florida areas. Senator Obama went to Orlando, Florida at night on August 1, 2008, and stayed overnight in Cocoa Beach, Florida. On August 2, 2008, Senator Obama went from Cocoa Beach back to Orlando from where he departed for Chicago, Illinois at approximately 5:30 pm.

16. President George W. Bush has been in Kennebunkport, Maine since July 31, 2008 and plans to return to Washington D.C. on August 3, 2008.

17. Based upon the foregoing, your affiant submits that there is probable cause to believe that GEISEL did knowingly and willfully threaten to kill, kidnap and inflict bodily harm upon a major candidate for the office of President of the United States, that is, Senator Barack Obama, in violation of Title 18, United States Code, Section 879.

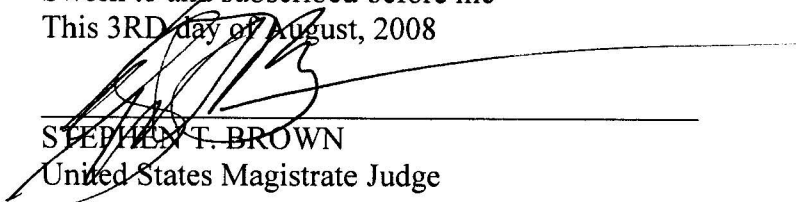
I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

FURTHER AFFIANT SAYETH NAUGHT



Paul R. Adie, Special Agent
United States Secret Service

Sworn to and subscribed before me
This 3RD day of August, 2008



STEPHEN T. BROWN
United States Magistrate Judge